

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION

IN RE: )  
 )  
NEW SCHOONEBEEK DAIRY, LLC, ) CASE NO. 09-34327-hcd  
Debtor. ) Chapter 11

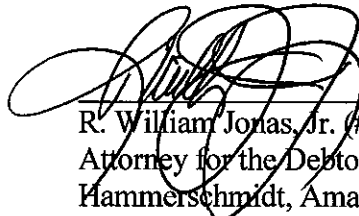
**MOTION TO DISALLOW SECURED CLAIM OF NORTH CENTRAL CO-OP**

Comes now the Debtor, by counsel, and moves pursuant to 11 USC § 506(a) to disallow the secured claim of North Central Co-op, filed herein as Claim No. 2 in the amount of \$146,186.98 on the grounds that:

1. The creditor is a junior secured creditor whose claim is wholly unsecured because the amount of the claim of the senior secured creditor exceeds the value of the collateral.
2. The amount of the claim is not in dispute.
3. Debtor proposes that Claim No. 2, in the amount of \$146,186.98, be allowed as unsecured.

WHEREFORE, Debtor prays that Claim No. 2 of North Central Co-op be allowed in the amount of \$146,186.98, as an unsecured claim, and for all other just and proper relief.

Respectfully submitted,



R. William Jonas, Jr. (#5025-71)  
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**Certificate of Service**

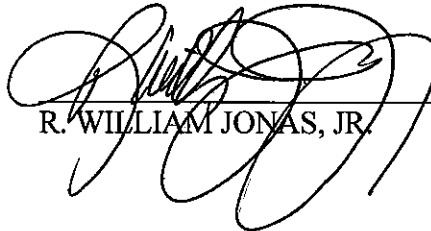
The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon:

Nancy Gargula  
United States Trustee  
One Michiana Square  
100 East Wayne Street, Room 555  
South Bend, IN 46601

Alexander L. Edgar  
Office of the U.S. Trustee  
One Michiana Square  
Fifth Floor  
100 E. Wayne Street  
South Bend, IN 46601

Mr. Matthew J. Connelly  
Blume Commelly, Jordan, Stucky & Lauer, LLP  
110 W. Berry St., Suite 1700  
Fort Wayne, IN 46802

by United States First Class Mail, postage prepaid this 20<sup>th</sup> day of October, 2010.



R. WILLIAM JONAS, JR.